

## **EXHIBIT C**

**Schramek, Adam T.**

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**From:** George Nolan <gnolan@LeaderBulso.com>  
**Sent:** Monday, November 16, 2015 12:00 PM  
**To:** Martin, Annika K.; Puig, Yvonne K.; Chalos, Mark P.  
**Cc:** Schramek, Adam T.; 'chris@gideoncooper. com'; Matt H. Cline; Ben Gastel; Orsland, Kristin; gerards@branstetterlaw.com; Daniel Clayton; Calderon, Daphne; Hoffman, Eric; Chris J. Tardio; Martinez, Stacey; Bill Leader  
**Subject:** RE: NECC depositions requested

Annika,

11/23 is no longer a good date in Reed and McElwee. 12/9 and 12/15 remain good dates.

Also, please list Bill Leader as the counsel for Ms. Parman on your chart. I understand that Bill recently provided you with some dates for Ms. Parman.

Thank you.

George

George Nolan  
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-----Original Message-----

From: Martin, Annika K. [mailto:akmartin@lchb.com]  
Sent: Monday, November 16, 2015 11:41 AM  
To: 'Puig, Yvonne K.'; Chalos, Mark P.  
Cc: Schramek, Adam T.; 'chris@gideoncooper. com'; Matt H. Cline; Ben Gastel; Orsland, Kristin; gerards@branstetterlaw.com; George Nolan; Daniel Clayton; Calderon, Daphne; Hoffman, Eric; Chris J. Tardio; Martinez, Stacey  
Subject: RE: NECC depositions requested

Yvonne,

Here is an updated version of the chart Mark sent last week, with additional plaintiffs' availability filled in. Will update to fill the remaining holes ASAP.

AKM

-----Original Message-----

From: Puig, Yvonne K. [mailto:yvonne.puig@nortonrosefulbright.com]  
Sent: Monday, November 16, 2015 11:38

To: Martin, Annika K.; Chalos, Mark P.

Cc: Schramek, Adam T.; 'chris@gideoncooper. com'; Matt H. Cline; Ben Gastel; Orsland, Kristin; gerards@branstetterlaw.com; George Nolan; Daniel Clayton; Calderon, Daphne; Hoffman, Eric; Chris J. Tardio; Martinez, Stacey

Subject: RE: NECC depos requested

Great news, thanks, Yvonne.

-----Original Message-----

From: Martin, Annika K. [mailto:akmartin@lchb.com]

Sent: Monday, November 16, 2015 10:32 AM

To: Puig, Yvonne K.; Chalos, Mark P.

Cc: Schramek, Adam T.; 'chris@gideoncooper. com'; Matt H. Cline; Ben Gastel; Orsland, Kristin; gerards@branstetterlaw.com; George Nolan; Daniel Clayton; Calderon, Daphne; Hoffman, Eric; Chris J. Tardio

Subject: RE: NECC depos requested

Yvonne,

More dates are coming today.

Best,  
AKM

-----Original Message-----

From: Puig, Yvonne K. [mailto:yvonne.puig@nortonrosefulbright.com]

Sent: Sunday, November 15, 2015 21:11

To: Chalos, Mark P.

Cc: Schramek, Adam T.; 'chris@gideoncooper. com'; Matt H. Cline; Ben Gastel; Orsland, Kristin; gerards@branstetterlaw.com; Martin, Annika K.; George Nolan; Daniel Clayton; Calderon, Daphne; Hoffman, Eric; Chris J. Tardio

Subject: NECC depos requested

Mark: When can we expect more dates as outlined in this email last Wednesday? Thanks, Yvonne.

-----Original Message-----

From: Chalos, Mark P. [mailto:mchalos@lchb.com]

Sent: Wednesday, November 11, 2015 11:53 AM

To: Puig, Yvonne K.

Cc: Schramek, Adam T.; 'chris@gideoncooper. com'; Matt H. Cline; Ben Gastel; Orsland, Kristin; gerards@branstetterlaw.com; Martin, Annika K.; George Nolan; Daniel Clayton

Subject: Deadly meningitis catastrophe

Yvonne- Here are available dates for we have been able to gather so far for plaintiffs depositions. More to follow.

-Mark

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**Schramek, Adam T.**

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**From:** Daniel L. Clayton <dclayton@kcbattys.com>  
**Sent:** Wednesday, November 18, 2015 2:00 PM  
**To:** Puig, Yvonne K.; Hoffman, Eric; Schramek, Adam T.  
**Cc:** Chalos, Mark P. (mchalos@lchb.com); Gerard Stranch; Randy L. Kinnard; 'chris@gideoncooper.com'  
**Subject:** [REDACTED] - Depo Notice Nov 23

Yvonne,

[REDACTED] called us a little while ago and to us that [REDACTED] has been diagnosed with [REDACTED]. [REDACTED] will be [REDACTED] on Friday, with a follow up on Tuesday.  
Thus, we will need to change the [REDACTED] deposition to another day. Please confirm.

Also, we were waiting on information from you re: December 4. Since I have not heard back from you regarding confirmation of any depositions on that date, I need to use that date for depositions in another Federal Court matter.

Thank you.

Daniel